June 28, 2010

FCC Secretary Marlene H. Dortch, Commission's Secretary
Office of the Secretary
Federal Communications Commission
445 12th. St., SW
Washington, DC 20554

Re: Office of Engineering and Technology Requests Information on Use of 1675-1710 MHz Band, ET Docket No. 10-123

Dear Secretary Dortch:

On behalf of Beaver Water District (BWD), I am writing in response to the FCC's request for information on the use of the 1675-1710 MHz Band. The 1675 – 1710 MHz Band is currently used by the USGS and other federal agencies to transmit streamgage and other critical environmental data. This data is used in the day to day water planning operations of lake managers, aquatic researchers, and especially local water utilities. I, therefore, urge you to preserve the current use of the 1675 – 1710 MHz Band to assure the availability of those data on a timely basis.

BWD is the wholesale provider of potable water to four municipalities in Northwest Arkansas. Together, our four customer cities serve over 250,000 residents plus industry. Our utility, like hundreds of utilities around the country, relies heavily upon the data collected by federal agencies such as the United States Geological Survey (USGS) and the National Oceanic and Atmospheric Administration (NOAA) for support of our daily operations.

Of specific interest are real time data from over 11,400 stream gauging stations operated by the USGS and collected through the Geostationary Operational Environmental Satellites Data Collection System (GOES DCS). Of these 11,400 stations, BWD uses data from 5 stations daily. During storm events, floods, and other natural or man-made disasters, timely streamflow data are critical to utility response. The use of the 1675-1710 MHz Band has allowed BWD and other water resource managers timely and reliable access to these data.

If the proposed use of the 1675 – 1710 MHz Band is approved, GEOS DCS users like USGS will lose the ability to download data directly from the GOES DCS. Instead, they will have to rely on an internet vendor for the data. The real–time function and reliability of the current streamgage system will likely be negatively impacted. If the internet service fails, as it frequently does in rural areas, then emergency response during natural disasters will be negatively impacted. Data transmitted via GOES DCS broadcast is not impacted by events that can interfere with earth based communications. In addition, the backup for the whole streamgage program is tied to the GOES DCS. If this backup system were unavailable, it would cost the USGS millions of dollars to find and employ new backup systems. All 11,400 stations will have to be reprogrammed at tremendous cost to the service.

BWD recommends the 1675 – 1710 MHz frequencies remain available for the use by the federal government's critical data transmission services. Water agencies, resource managers, researchers, and the general public all rely on the wealth of timely data made reliably available for managing our nation's water supply.

Sincerely,

Robert Morgan
Manager of Environmental Quality
Beaver Water District

CC: Rep. John Boozman
Larry Lloyd, COO Beaver Water District
Alan Fortenberry, CEO Beaver Water District